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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING
PLAINTIFF WAYMO LLC'S MOTION
FOR SANCTIONS**

1 Having considered Plaintiff Waymo LLC's ("Waymo") Motion for Sanctions against
2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (collectively,
3 "Defendants"), all of the papers submitted by the parties, the relevant authorities, and the oral
4 arguments of counsel, the Court hereby **GRANTS** Waymo's Motion for Sanctions in its entirety and
5 **ORDERS** that:

6 1. Defendants shall henceforth be precluded from arguing, in any papers or at trial, that
7 Waymo does not adequately protect its SVN server;

8 2. Defendants shall henceforth be precluded from arguing, in any papers or at trial, that
9 the name and address of Waymo's SVN repository is not confidential;

10 3. Defendants shall redact the domain name and address of Waymo's SVN repository
11 from any future filings;

12 3. Defendants shall take all necessary and appropriate corrective action to remove the
13 improperly disseminated information regarding Waymo's SVN domain name and address from the
14 docket in this case and from any other location in the public domain where that information may be
15 found as a direct result of Defendants' improper filings, and shall inform the Court of all such
16 remedial steps taken in a declaration of counsel to be filed no later than seven (7) days from entry of
17 this Order; and

18 4. Plaintiff is awarded all attorneys' fees, costs, and expenses incurred because of
19 Defendants' wrongful disclosure of the name and address of its SVN repository.

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21 **IT IS SO ORDERED.**

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23 Dated: _____, 2017

24 HONORABLE JACQUELINE SCOTT CORLEY
United States Magistrate Judge
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